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6 SHAHID BUTTAR FOR CONGRESS COMMITTEE and SHAHID BUTTAR
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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 SHAHID BUTTAR FOR CONGRESS
12 COMMITTEE, et al.,

13 Plaintiffs,

14 vs.

15 HEARST COMMUNICATIONS, INC.,

16 Defendant.

Case No. 3:21-cv-05566-EMC

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING AND
HEARING SCHEDULE**

Action filed: July 20, 2021

17 Pursuant to Local Rules 6-2 and 7-12, Plaintiffs Shahid Buttar for Congress Committee
18 and Shahid Buttar (collectively, “Plaintiffs”) and Defendant Hearst Communications, Inc.
19 (“Defendant”) hereby stipulate and respectfully request that the Court approve the following
20 briefing and hearing schedule.

22 WHEREAS, Plaintiffs filed their complaint in this action on July 20, 2021 (ECF No. 1);

23 WHEREAS, on Apr. 25, 2022 the Court issued an Order (ECF No. 39) which (a) granted
24 Defendant’s Motion to Dismiss, and (b) gave Plaintiffs leave to amend their Complaint;

25 WHEREAS, Defendant intends to file a Special Motion to Strike Plaintiffs’ Complaint
26 after the First Amended Complaint (FAC) has been filed;

1 WHEREAS, on May 24, 2044, the Court issued an Order (ECF No. 41) setting a
2 schedule with respect to the FAC and Defendant's contemplated Special Motion to Strike;

3 WHEREAS, pursuant to that Order, Plaintiffs must file their FAC no later than June 17,
4 2022;

5 WHEREAS, in light of a family medical issue, the Parties have met and conferred
6 regarding the schedule with respect to the FAC and Defendant's contemplated Special Motion
7 to Strike;

8 WHEREAS, extending the deadline for filing the aforementioned documents, as set forth
9 below, will enable counsel to allow for a more complete and orderly presentation of the legal
10 issues the Court will need to resolve;

11 NOW THEREFORE, the Parties hereby stipulate and agree to set the following
12 deadlines:

- 13 1. Plaintiffs' First Amended Complaint will be due on July 29, 2022.
- 14 2. Defendant's Special Motion to Strike and any other responsive pleading will be
15 due on Sept. 9, 2022.
- 16 2. Plaintiffs' Opposition will be due on Oct. 7, 2022;
- 17 2. Defendant's Reply will be due on Oct. 28, 2022; and
- 18 3. The hearing on Defendant's Special Motion to Strike will be held on Nov. 10,
19 2022, 1:30 pm.

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1 IT IS SO STIPULATED.

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3 DATED: June 15, 2022

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Respectfully submitted,

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BUSINESS, ENERGY, AND ELECTION LAW, PC
GAUTAM DUTTA

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By: /s/ Gautam Dutta
Gautam Dutta

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Attorneys for Plaintiffs

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DATED: June 15, 2022

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Respectfully submitted,

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DAVIS WRIGHT TREMAINE LLP
THOMAS R. BURKE

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THE HEARST CORPORATION

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JONATHAN R. DONNELLAN (admitted *pro hac
vice*)
DIEGO IBARGUEN (admitted *pro hac vice*)

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By: /s/ Thomas R. Burke

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*Attorneys for Defendant Hearst Communications,
Inc.*

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation. In compliance with Local Rule 5-1(i)(3), I hereby attest that the other signatories have concurred in this filing.

Dated: June 15, 2022

By: /s/ Gautam Dutta
GAUTAM DUTTA

Attorney for Plaintiffs

1	UNITED STATES DISTRICT COURT	
2	NORTHERN DISTRICT OF CALIFORNIA	
3	SHAHID BUTTAR FOR CONGRESS COMMITTEE, et al.,	Case No. 3:21-cv-05566-EMC
4	Plaintiffs,	[PROPOSED] ORDER REGARDING BRIEFING SCHEDULE ON DEFENDANT'S SPECIAL MOTION TO STRIKE
5	vs.	
6	HEARST COMMUNICATIONS, INC.,	Action filed: July 20, 2021
7	Defendant.	
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10 **[PROPOSED] ORDER**

11 Pursuant to the stipulation of the parties and good cause appearing, it is hereby
12 ORDERED as follows:

13 3. Plaintiffs' First Amended Complaint will be due on July 29, 2022.

14 4. Defendant's Special Motion to Strike and any other responsive pleading will be
15 due on Sept. 9, 2022.

16 2. Plaintiffs' Opposition will be due on Oct. 7, 2022;

17 2. Defendant's Reply will be due on Oct. 28, 2022; and

18 3. The hearing on Defendant's Special Motion to Strike will be held on Nov. 10,
19 2022, 1:30 pm.

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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4 Dated: June __, 2022

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6 Hon. Edward M. Chen
7 United States District Judge
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